



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

July 21, 2023

**BY ECF**

Honorable Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *United States v. Michael Shvartsman et al.*, 23 Cr. 307 (LJL)

Dear Judge Liman

The Government writes regarding the bail conditions in the above-referenced matter. During the July 20, 2023, conference, the Government proposed, the defendants accepted, and the Court imposed the conditions of release set forth below. The Government respectfully requests that the Court so-order the below conditions or enter them in a written order.

1. Each defendant will sign a bond in the following amounts: Michael Shvartsman in the amount of \$20,000,000; Gerald Shvartsman in the amount of \$5,000,000; and Bruce Garelick in the amount of \$100,000.
2. The bonds of Michael and Gerald Shvartsman will each be signed by three financially responsible persons, one of whom, with respect to each, is a spouse. The bond of Bruce Garelick will be signed by two financially responsible persons. All co-signers shall be interviewed and approved by the United States Attorney's Office for the Southern District of New York. Co-signers will be permitted to sign the bonds of more than one defendant.
3. The defendants shall surrender all passports to Pretrial Services and make no new applications.
4. The defendants shall be subject to regular reporting to Pretrial Services.
5. The defendants shall not have any contact with the victims or witnesses specified in a July 20, 2023, letter from the Government to counsel for the defendants, except in the presence of counsel.
6. The defendants shall not communicate with each other about the above-referenced case or the facts underlying the case, except in the presence of counsel.
7. The defendants shall not possess any firearms.
8. The defendants' travel shall be restricted to the Southern District of New York, the Eastern District of New York, the Southern District of Florida, and points in between for purposes of attending court proceedings or meeting with legal counsel.

9. Michael Shvartsman shall not further encumber the property known to the parties as Apartment 2701 and Gerald Shvartsman shall not further encumber the property known to the parties as 32 Avenue.
10. The defendants shall maintain their residence in their current apartment or home, or any apartment or home currently under renovation.
11. The defendants shall not make any individual financial transfers in excess of \$5,000 without the approval of Pretrial Services or the United States Attorney's Office for the Southern District of New York. This restriction does not apply to legal fees and business payroll expenses.
12. The defendants shall not open new financial accounts without prior written approval of Pretrial Services or the United States Attorney's Office for the Southern District of New York.

The entry of the foregoing conditions would be without prejudice to any future application by the Government or by the defendants, including but not limited to modification of the restrictions on financial transfers or witness contacts.

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

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